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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Case No. 18-14315-MBK
Chapter 7

IN RE: ALFRED LATTANZIO,

Motion returnable: May 29, 2018

NOTICE OF MOTION TO LIFT
AUTOMATIC STAY

Debtor.

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S I R S:

PLEASE TAKE NOTICE, that the undersigned attorneys will apply to the United States Bankruptcy Court, District of New Jersey, located at 402 East State Street, Trenton, New Jersey 08608, on May 29, 2018, at 10:00 in the forenoon of that date, or as soon thereafter as counsel may be heard, for the entry of the within proposed form of Order, served and filed together herewith. The grounds for the within motion are as set forth more fully in the Certification of RICHARD CIMO, annexed hereto, and served and filed together herewith. The within motion is for an Order, that the stay imposed herein by virtue of 11 U.S.C. Section 362(a) be hereby vacated and set aside, as to the

debtor, ALFRED LATTANZIO, with respect to the designated personal property collateral, i.e., 40,649 shares of New Millennium Bank, Certificate of Deposit \$57,608.35, and, further, the Movant shall be authorized to apply to this Court at the foot of the Order for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE, that the within motion shall be deemed uncontested and the proposed form of Order signed in the discretion of the Court, unless responsive papers are timely filed and served stating with particularity the basis of the opposition to the relief sought.

CERTIFICATION

The undersigned certifies that no novel issues of law or fact are presented on this motion to necessitate or require the preparation and filing of a Brief on this application.

DATED: April 25, 2018

OSTROWITZ & OSTROWITZ, ESQS.
Attorneys for Movant

By: /s/ Alan R. Ostrowitz
A Member of the Firm